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11 Attorneys for USACM Liquidating Trust

12 **UNITED STATES BANKRUPTCY COURT**
13 **DISTRICT OF NEVADA**

14 In re:

15 **USA COMMERCIAL MORTGAGE**
16 **COMPANY,**

17 Debtor.

18 Case No. BK-S-06-10725-LBR

19 Chapter 11

20 Jointly Administered Under Case No.
21 BK-S-06-10725 LBR

22 **DECLARATION OF EDWARD M.**
BURR IN SUPPORT OF OMNIBUS
OBJECTIONS TO PROOFS OF
CLAIM BASED UPON
INVESTMENT IN PLACER I AND
CERTIFICATE OF SERVICE

23 Date of Hearing: July 26, 2011

24 Time of Hearing: 1:30 p.m.

25 Estimated time for Hearing: 10 minutes

26 I, Edward M. Burr, hereby declare under penalty of perjury that:

1. I am a principal with Sierra Consulting Group, LLC (“Sierra”). Sierra is one
2 of the leading providers of restructuring advisory and litigation support services in the
3 Southwest. Sierra is a leading national consulting firm comprised of experienced CPAs
4 and other financial professionals.

2. I submit this declaration on behalf of the USACM Liquidating Trust’s
3 Objections to Proofs of Claim filed this date.

4. This Court approved the Official Committee of Unsecured Creditors of USA
5 Commercial Mortgage Company’s (“Committee”) appointment of Sierra as financial
6 advisers on August 11, 2006. From that date to the Effective Date of the Debtors’

1 confirmed Plan of Reorganization, I have assisted the Committee in analyzing facts
2 concerning these jointly administered bankruptcy cases. As of the Effective Date of the
3 confirmed Plan of Reorganization, Sierra has been retained by the USACM Liquidating
4 Trust to investigate and reconcile the claims against the USA Commercial Mortgage
5 Company (“USACM”) estate.

6 4. I make the following declaration based upon my personal knowledge, and
7 upon the records of the Debtors described in this declaration, including Debtors’ original
8 and amended schedules of liabilities and the proofs of claim described herein, as well as
9 Debtors’ accounting records.

10 5. On March 12, 2007 Effective Date of the Plan, the USACM Liquidating
11 Trust succeeded to USACM’s rights with respect to books and records.

12 6. Sierra has been working closely with both the Trustee for the USACM
13 Liquidating Trust and Development Specialist Inc. (“DSI”), the Trustee’s financial
14 advisor, in evaluating all of the claims that were filed in the USACM estate.

15 7. **Exhibit A**, attached, lists Proofs of Claim that appear to be based, in whole
16 or in part, upon an investment in the Placer I Loan (“Placer I Loan”). For each claim
17 listed, **Exhibit A** identifies the Proof of Claim number, the claimant, the claimant’s
18 address, the total amount of the claim, and the total amount of the claim that appears to be
19 related to the Placer I Loan based upon the information provided by the claimant.

20 Dated: June 13, 2011

21 /s/ Edward M. Burr

22 Edward M. Burr

23 Copy of the foregoing mailed (without exhibit)
24 by First Class Postage prepaid U.S. Mail on
June 13, 2011 to the Investors in the
Placer I Loan listed on Exhibit A.

25
26 s/ Matt Burns
Matt Burns